

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,

Case No. 1:24-cv-00040-EAW-MJR

Plaintiff,

vs.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

DECLARATION OF AMANDA LUNDERGAN

I, Amanda Lundergan, state as follows:

1. I submit this declaration in support of the Third-Party Motion (and Memorandum in Support of the Motion) To Intervene for Purposes of Filing an Objection to Receiver's Report and a Motion to Appoint Special Receiver and for Other Purposes; Motion (and Memorandum in Support of the Motion) to Appoint a Special Receiver; and the Objections to the Receiver's Fee Application.

2. I represent the Defendants in the case of *McNamara as the Court-Appointed Receiver v. Ice Legal P.A. et al.*, Case No. 1:25-CV-00275 (W.D.N.Y.) and am making a special appearance (i.e. without waiving jurisdictional objections) in the above-captioned case to file and argue a Third-Party Motion to Intervene for Purposes of Filing Objections to the Receiver's Fee

Application and a Motion to Appoint Special Receiver and for Other Purposes and proceedings related thereto.

3. As Ice Legal's attorney, I communicated with attorneys Logan Smith and Alexander Wall from McNamara's firm, both by email and telephone, regarding a tolling agreement and an attempt to schedule mediation.

4. The document referenced as Exhibit 2 to Ice Legal's Objections to the Receiver's Fee Application, is a true and correct copy of the email received from Logan Smith, dated March 11, 2025.

5. In our telephone conversations regarding mediation scheduling, Mr. Smith said that his client, the Receiver, was not interested in a mediation where Ice Legal's defenses were discussed and that Ice Legal should just assess its exposure and make an offer.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the above statements are true and correct.

Executed on May 7, 2025.

/s/Amanda Lundergan
Amanda Lundergan